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August 23, 2019

**Via ECF**

Hon. Michael A. Hammer, U.S.M.J.  
United States District Court  
For the District of New Jersey  
Rev. Dr. Martin Luther King, Jr.  
Federal Building & U.S. Courthouse  
50 Walnut Street,  
Newark, New Jersey 07102

Re: *Isley et al v. BMW of North America, LLC*  
Civil Action No. 2:19-cv-12680-ES-MAH  
*Joint Stipulation & Proposed Order on Motion to Dismiss*

Dear Judge Hammer:

This firm represents Defendant BMW of North America, LLC ("BMW NA"). Enclosed please find the parties' joint stipulation and proposed order regarding BMW NA's planned motion to dismiss the First Amended Complaint. If the stipulation meets with your approval, we ask that it be entered as an order on ECF.

Should you have any questions, counsel are available to discuss.

Respectfully,

*Melissa J. Bayly*

Melissa J. Bayly

CJD/dtb

Enclosure

cc: Frederick J. Klorczyk III, Esq. (via ECF) (w/encl.)